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In re:	:	
	:	Chapter 11
THE CHRISTIAN BROTHERS OF IRELAND, INC.,	:	
	:	Case No.: 11-22821 (RDD)
Debtor.	:	
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[illegible]

1. I am the Vice-President of The Christian Brothers of Ireland, Inc. (the “Debtor”), and submit this affidavit pursuant to Rule 1007-2 of the Local Rules of this Court.

3. A copy of the Debtor's board resolution authorizing the Chapter 11 filing is attached to the petition and incorporated by reference herein. Unless otherwise indicated, all financial information contained herein is presented on an estimated and unaudited basis.

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As a not-for-profit corporation, the assets, and/or income are not distributable to, and do not inure to the benefit of its members, or officers. The Debtor depends upon grants and donations to fund a portion of its operating expenses.

5. The Debtor's immediate need for relief in this Court stems from the fact that the Debtor has been named in numerous sexual abuse lawsuits which are alleged to have occurred approximately 30 years ago, primarily in Washington State.<sup>1</sup> The Debtor has attempted to obtain global resolution of the remaining lawsuits pending in Washington State through mediation. However, the lawsuits remain unresolved. The lawsuits continue to drain the Debtor's extremely limited financial resources. Recently, other similar religious organizations, such as the Diocese of Wilmington (located in the state of Delaware), and the Diocese of Spokane (located in the state of Washington), have utilized Chapter 11 to resolve abuse claims.

6. Pursuant to Rule 1007-2(a)(4) of the local bankruptcy rules annexed hereto as **Exhibit "1"** is a list containing the names and addresses of the Debtor's twenty (20) largest unsecured creditors, excluding insiders.<sup>2</sup>

7. Pursuant to Rule 1007-2(a)(5) of the local bankruptcy rules, annexed hereto as **Exhibit "2"** is a list containing the names of the holders of the Debtor's five (5) largest secured claims.

8. Pursuant to Rule 1007-2(a)(6) of the local bankruptcy rules, annexed hereto as **Exhibit "3"** is a summary of the Debtor's assets and liabilities. This is an internally generated estimate of assets and liabilities and may require certain adjustments.

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<sup>1</sup> The State of Washington has a "delayed discovery" rule.

<sup>2</sup> The majority of the Debtor's largest unsecured creditors consist of plaintiffs in pending abuse cases. These claims are unliquidated. To protect the identity of the alleged abuse victims, consistent with a state court order, actual names have not been listed but counsel for the plaintiffs is referenced in the list filed under Federal Rules of Bankruptcy Procedure 1007(d).

9. The Debtor does not have any publicly held shares, debentures, or other securities.

10. There is no property of the Debtor in the possession or custody of any public officer, receiver, trustee, pledge, assignee of rents, liquidators, secured creditors, or agents of such person.

11. The Debtor's assets consist primarily of real estate, a loan receivable and donor restricted cash. The Debtor's books and records are located at 10001 S. Pulaski, Chicago, Illinois 60655.

12. The Debtor is managed through a board of members (the "Members"). The Members are Brother Daniel Casey, Brother Kevin Griffith, Brother Barry Lynch, Brother Anthony Murphy, Brother Hugh O'Neill, and Brother Raymond Vercruysse. The Members do not receive a salary. The Members do obtain certain modest stipends, reimbursement of expenses and payment of medical benefits.

13. The Debtor has no employees.

14. The Debtor is not a tenant under any non-residential real property lease.

15. The Debtor is a party to numerous lawsuits pending primarily in Washington State. Some of the lawsuits in Washington State are close to being trial ready.

16. The Debtor expects to obtain cash grants, as well as other miscellaneous sources of cash to fund its various operations in the amount of approximately \$100,000 for the thirty (30) day period following the Chapter 11 filing. The Debtor's operating expenses during this same thirty (30) day period should be approximately \$90,000.

17. The Debtor intends to continue in operation and propose a plan of reorganization which treats all creditors in a fair and equitable manner consistent with the provisions of the Bankruptcy Code.

/s/ Brother Kevin Griffith

Brother Kevin Griffith  
Vice-President

Sworn to before me this  
28th day of April, 2011

/s/ Anthony D. Dougherty

Anthony D. Dougherty  
Notary Public, State of New York  
No. 314985701  
Qualified in New York County  
Commission Expires August 26, 2013